## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN MILWAUKEE DIVISION

Jonathan Komberec,

v.

Plaintiff, : Civil Action No.: 2:17-cv-00316-PP

National Credit Adjusters, LLC; Lionstone Holdings Group, LLC; and DOES 1-10, inclusive,

Defendants.

## REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANTS NATIONAL CREDIT ADJUSTERS, LLC AND LIONSTONE HOLDINGS GROUP, LLC

Plaintiff, Jonathan Komberec (hereinafter "Plaintiff"), by and through Plaintiff's counsel, hereby requests the Clerk of the Court to enter default against Defendants National Credit Adjusters, LLC and Lionstone Holdings Group, LLC pursuant to Fed. R. Civ. P. 55(a) on the grounds that Defendants have failed to answer this matter's Complaint and have failed to appear or otherwise defend this action. (Cueller Decl. <sup>1</sup>¶5).

On March 8, 2017, Defendants were served with the summons and complaint, as evidenced by proof of service on file with this Court. (Cueller Decl. ¶ 3). Neither Plaintiff nor the Court has granted Defendants an extension of time to respond to the Complaint. (Cueller Decl. ¶ 4). Upon information and belief, neither Defendant is an infant or an incompetent person nor in the military service. (Cueller Decl. ¶¶ 6-7).

DATED: August 1, 2017

Respectfully submitted,

By /s/ Amy L. Cueller

<sup>&</sup>lt;sup>1</sup> "Cueller Decl." refers to the Declaration of Amy L. Cueller.

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 1, 2017, a true and correct copy of the foregoing Request for Entry of Default and supporting declaration was served electronically by the U.S. District Court for the Eastern District of Wisconsin Electronic Document Filing System (ECF) and that the document is available on the ECF system. A copy of the foregoing was also mailed by first-class mail, postage prepaid to the parties listed below:

National Credit Adjusters, LLC 327 West 4th Street, P.O. Box 3023 Hutchinson, Kansas 67504

Lionstone Holdings Group, LLC 1207 Delaware Avenue, Suite 206 Buffalo, New York 14209

/s/ Amy L. Cueller
Amy L. Cueller, Esq.